

FILED

SEP - 8 2016

CLERK, U.S. DISTRICT COURT

By 22-1236
Deputy

PETITIONER

Navarro, Sydney Melissa.

v.

No. 4:13CR-100-A(07)

UNITED STATES

RESPONDENT

MOTION TO VACATE AND CORRECT SENTENCE PURSUANT
TO 28 U.S.C. 2255

On 12-23-2013, this Honorable Court sentenced Petitioner to a term of 275 months imprisonment after finding that he/she had at least one prior felony conviction for a "crime of violence" as defined by the residual clause of U.S.S.G. § 4B1.2, which triggered application of the sentencing enhancement in U.S.S.G. § 391. This Guideline's residual clause is materially indistinguishable from the residual clause found in the Armed Career Criminal Act ("ACCA"). (18 U.S.C. § 924(e)(2)(B)(ii)). On June 26, 2015, the Supreme Court in *Johnson v. United States*, 135 S. Ct. 2551 (2015), struck down the ACCA's residual clause as void for vagueness. It follows that § 4B1.2's residual clause is likewise unconstitutionally vague. Therefore, the sentencing enhancement Petitioner received as a result of the Court's application of the residual clause in § 4B1.2 cannot be sustained, and the sentence Petitioner received must be vacated forthwith.

Invalidation of the ACCA's residual clause by the Court in *Johnson* compels the conclusion that § 4B1.2's identically worded residual clause also violates due process.

Taylor v. United States, 803 F.3d 931, 933 (8th Cir. 2015). Moreover, because the Supreme Court in *Welch v. United States*, 136 S. Ct. 1257 (2016), emphasized that “*Johnson* announced a substantive rule that has retroactive effect in cases on collateral review,” *Johnson*’s holding opens the door for Petitioner to collaterally attack his sentence without otherwise being time-barred.

That the holding of *Johnson* applies retroactively to invalidate the residual clause of § 4B1.2 is a premise that no court of authority in this Circuit has expressly rejected. To the contrary, the matter is currently on appeal before the Eighth Circuit. *See, McCaughan v. United States*, No. 16-2270, 16-2271, 16-2272 (8th Cir. 2016). In addition, there are at least three petitions for *writs of certiorari* pending before the United States Supreme Court, all of which address whether *Johnson* applies retroactively to the Guidelines. *See, Jones v. United States*, No. 15-8629 (cert. filed May 15, 2016); *Beckles v. United States*, No. 15-8544 (cert. filed May 9, 2016); and *Rivero v. United States*, No. 15-7776 (cert. filed Jan. 14, 2016). The fact that the Court in *Johnson* relied on four lower court decisions interpreting § 4B1.2(a)(2)’s residual clause (and only two ACCA decisions) to demonstrate that it “has proved nearly impossible” to “make sense of the residual clause” is telling. *See* 135 S. Ct. at 2559-60 (analyzing *United States v. Carthorne*, 726 F.3d 503 (4th Cir. 2013); *United States v. Whitson*, 597 F.3d 1218 (11th Cir. 2010); *United States v. McDonald*, 592 F.3d 808 (7th Cir. 2010); *United States v. Williams*, 559 F.3d 1143 (10th Cir. 2009)) - To be sure, to date the Supreme Court has vacated and remanded seventeen lower Court

decisions in which defendants had been sentenced under § 4B1.2(a)'s residual clause, including five cases on collateral review, in light of *Johnson*.¹

Thus, the only plausible argument that Petitioner is *not* entitled to have his sentence vacated must be based on the assumption that his prior conviction qualifies as a "crime of violence" under the "enumerated offenses" clause or "elements" clause of the crime of violence definition in § 4B1.2(a). Petitioner's conviction does not qualify as a "crime of violence" under the enumerated offenses clause because the state statute of conviction does not match the generic definition of burglary, arson, extortion, or use of explosives offense. Likewise, it does not qualify as a "crime of violence" under the elements clause because it does not have as an element the use, attempted use, or threatened use of violent physical force.

As explained by the Supreme Court in *Taylor v. United States*, 495 U. S. 575 (1990), to decide whether a prior conviction falls under either one of these clauses, the court must engage in a meaningful review of the state statute of conviction using the categorical

21:846-8841 A 1.

¹ The GVRs include fifteen career offender cases, see *Caldwell v. United States*, 136 S. Ct. 417 (2015); *Banks v. United States*, 136 S. Ct. 365 (2015); *McCarthren v. United States*, 136 S. Ct. 332 (2015); *Gonzales v. United States*, 136 S. Ct. 84 (2015); *Maldonado v. United States*, 135 S. Ct. 2929 (2015); *Smith v. United States*, 135 S. Ct. 2930 (2015); *Vinales v. United States*, 135 S. Ct. 2928 (2015); *Richardson v. United States*, No. 15-6053, 2016 WL 763200 (S. Ct. Feb. 29, 2016); *Moon v. United States*, No. 15-7189, 2016 WL 1173109 (S. Ct. Mar. 28, 2016); *Jeffries v. United States*, No. 157300, 2016 WL 1173110 (S. Ct. Mar. 28, 2016); *Beckles v. United States*, 135 S. Ct. 2928 (2015) (§ 2255 motion); *Denson v. United States*, 135 S. Ct. 2931 (2015) (§ 2255 motion); *Jones v. United States*, 135 S. Ct. 2944 (2015) (§ 2255 motion); *Jones v. United States*, 136 S. Ct. 333 (2015) (§ 2255 motion); *Wynn v. United States*, 135 S. Ct. 2945 (2015) (§ 2255 motion); one § 2K2.1 case, see *Talmore v. United States*, 135 S. Ct. 2937 (2015); and one § 7B1.1 case, see *Cooper v. United States*, 135 S. Ct. 2938 (2015).

approach. It is simply insufficient for the court to classify a prior conviction as a "crime of violence" based solely on the title of the statute or a summary of facts contained in the PSR. It is for this reason that Petitioner requests that counsel be appointed. Counsel has access to legal research tools that Petitioner does not. Counsel has access to court records and state statutes that Petitioner does not. What's more, Counsel is in a better position to keep up to date on developments in the law which support Petitioner's claim for relief. Accordingly, Petitioner submitted an accompanying Motion to Appoint Counsel and urges the court to appoint counsel for him. The Federal Public Defender Office has indicated it will accept appointment in this case.

In conclusion, Petitioner's motion is timely under 28 U.S.C. § 2255(f)(3) because it has been filed within one year of the Supreme Court's decision in *Johnson* — a ruling which established a "newly recognized" right that is "retroactively applicable to cases on collateral review." Petitioner respectfully requests that this Court grant his § 2255 motion, vacate his current sentence, and re-sentence him accordingly.

Respectfully submitted,

X Sydney Navand

**Motion to Vacate, Set Aside, or Correct a Sentence
By a Person in Federal Custody**

(Motion Under 28 U.S.C. § 2255)

Instructions

1. To use this form, you must be a person who is serving a sentence under a judgment against you in a federal court. You are asking for relief from the conviction or the sentence. This form is your motion for relief.
 2. You must file the form in the United States district court that entered the judgment that you are challenging. If you want to challenge a federal judgment that imposed a sentence to be served in the future, you should file the motion in the federal court that entered that judgment.
 3. Make sure the form is typed or neatly written.
 4. You must tell the truth and sign the form. If you make a false statement of a material fact, you may be prosecuted for perjury.
 5. Answer all the questions. You do not need to cite law. You may submit additional pages if necessary. If you do not fill out the form properly, you will be asked to submit additional or correct information. If you want to submit a brief or arguments, you must submit them in a separate memorandum.
 6. If you cannot pay for the costs of this motion (such as costs for an attorney or transcripts), you may ask to proceed *in forma pauperis* (as a poor person). To do that, you must fill out the last page of this form. Also, you must submit a certificate signed by an officer at the institution where you are confined showing the amount of money that the institution is holding for you.
 7. In this motion, you may challenge the judgment entered by only one court. If you want to challenge a judgment entered by a different judge or division (either in the same district or in a different district), you must file a separate motion.
 8. When you have completed the form, send the original and 2 copies to the Clerk of the United States District Court at this address:

Clerk, United States District Court for
Address
City, State Zip Code
- If you want a file-stamped copy of the petition, you must enclose an additional copy of the petition and ask the court to file-stamp it and return it to you.
9. **CAUTION:** You must include in this motion all the grounds for relief from the conviction or sentence that you challenge. And you must state the facts that support each ground. If you fail to set forth all the grounds in this motion, you may be barred from presenting additional grounds at a later date.
 10. **CAPITAL CASES:** If you are under a sentence of death, you are entitled to the assistance of counsel and should request the appointment of counsel.

Department of Justice

INMATE SKILLS DEVELOPMENT PLAN

PROGRAM REVIEW: 05-04-2016

Sentencing: Texas Northern Probation Office
 Earle Cabell Federal Building and United States
 Courthouse
 1100 Commerce Street Room 1329
 Dallas, TX 75242

Relocation: [District]
 [Street Address/Suite]
 [City], [State] [Zip]
 Phone/Fax: [Phone] / [Fax]

Phone/Fax: 214-753-2500 / 214-753-2570

Subject to 18 U.S.C. 4042(B) Notification: Y
 • Conviction for a drug trafficking crime (federal)

DNA Required:
 Treaty Transfer Case:

Y - 02-20-2014
 N

Profile Comments:

EDUCATION DATA					
Facility	Assignment	Description	Start Date	Stop Date	
CRW	ESL HAS	ENGLISH PROFICIENT	04-08-2014	CURRENT	
CRW	GED EN	ENROLL GED NON-PROMOTABLE	04-08-2014	CURRENT	
CRW	PAR-5ESS	5 ESSENTIALS OF PARENTING	04-19-2016	CURRENT	
CRW	GED 7B MC	GED MC 845-1030 M-F ROUSE	12-04-2015	CURRENT	

COMPLETED EDUCATION COURSES		
Course Description	Completion Date	Course Hours
GED MC/0745-0915 M/T/TH/F - TL	12-03-2015	0
INTERVIEW W/A TROUBLED BKGRND	10-26-2015	0
JOB FAIR INTERVIEW HOSPITAL	06-26-2015	3
GED MC/1230-1400 M/T/W/TH - TL	07-02-2015	0
LIFE MANAGEMENT SKILLS I	02-28-2015	15
BEGINNER SOFTBALL FCI	09-09-2014	12
CONFLICT RESOLUTION	12-20-2014	10
TOURNAMENT MANAGEMENT FCI	05-11-2014	12
BILLIARDS	06-03-2014	16
SELF ESTEEM FCI	06-04-2014	10

HIGH TEST SCORES						
Test	Subtest	Score	Test Date	Test Fac	Form	State
TABE A	READING	8.20	05-04-2015	CRW	A 9	
TABE D	LANGUAGE	6.30	05-04-2015	CRW	D 9	
TABE E	TOTAL MATH	5.50	05-04-2015	CRW	E 9	
TABE E	MATH COMP	4.50	05-04-2015	CRW	E 9	
TABE E	MATH APPL	6.90	05-04-2015	CRW	E 9	

WORK DATA					
Facility	Assignment	Description	Start Date	Stop Date	

Name: NAVARRO, SYDNEY MELISSA

RegNo: 46030-177

CRW	MAINT 5	MAINTENANCE SHOP 5	11-10-2015	CURRENT
WORK HISTORY				
Facility	Assignment	Work Assignment Description	Start Date	Stop Date
CRW	MAINT 5	MAINTENANCE SHOP 5	05-04-2015	11-04-2015

DISCIPLINE HISTORY				
UDC / DHO	Hearing Date	Report No.	Prohibited Act / Description	Sanction
UDC	01-04-2016	2800096	316 - BEING IN UNAUTHORIZED AREA	LP PHONE / 15 DAYS / CS COMP: LAW: LOSS OF PHONE PRIVILEGES FOR 15 DAYS. EFFECTIVE LAW: IMMEDIATELY

MOVEMENT DATA				
Facility	Assignment	Description	Start Date	Stop Date
CRW	A-DES	DESIGNATED, AT ASSIGNED FACIL	04-14-2015	CURRENT
MOVEMENT HISTORY				
Facility	Assignment	Start Date	Stop Date	
	Inmate has no movement history items in this area			

CASE MANAGEMENT ASSIGNMENTS				
Facility	Assignment	Description	Start Date	Stop Date
CRW	RPP UNT C	RELEASE PREP UNIT PGM COMPLETE	11-09-2015	CURRENT
CRW	LCP PART	LIFE CONNECT PROG PARTICIPANT	06-11-2015	CURRENT
CRW	CRW LCP 26	CARSWELL LCP TEAM 26	06-11-2015	CURRENT
CRW	RPP NEEDS	RELEASE PREP PGM NEEDS	03-18-2014	CURRENT
CRW	V94 CDA913	V94 CURR DRG TRAF ON/AFT 91394	03-18-2014	CURRENT





MEDICAL DUTY STATUS ASSIGNMENTS				
Facility	Assignment	Description	Start Date	Stop Date
CRW	YES F/S	CLEARED FOR FOOD SERVICE	06-24-2015	CURRENT
CRW	REG DUTY	NO MEDICAL RESTR--REGULAR DUTY	06-24-2015	CURRENT
CRW	NO PAPER	NO PAPER MEDICAL RECORD	04-14-2015	CURRENT

Department of Justice





Federal Bureau of Prisons

INMATE SKILLS DEVELOPMENT PLAN**PROGRAM REVIEW: 05-04-2016****ACADEMIC**

*** Disregard Response Summary and utilize only the Progress & Goals section ***

Status	Response Summary
	INTELLECTUAL FUNCTIONING ⊕ no intellectual deficits ① has NOT attended special education classes
	LITERACY ⊖ education level is higher than 10th grade
	LANGUAGE ⊕ fluent in English as primary language
	COMPUTER SKILLS ⊕ possesses keyboarding skills ⊕ possesses word processing skills ⊕ possesses internet navigation skills
Progress and Goals	
Previous TEAM 11-09-2015 Follow-Up: Enrolled in the General Educational Development (GED) Program. Recommendation: Attend classes 4 days a week or as recommended by education staff. Current TEAM	

VOCATIONAL/CAREER *** Disregard Response Summary and utilize only the Progress & Goals section ***

Status	Response Summary
	EMPLOYMENT HISTORY ① unemployed at time of arrest ⊖ no consistent history of employment 5 years prior to incarceration ① sporadic history of employment (frequent, non-promotional job changes)
	CAREER DEVELOPMENT ⊕ possesses significant expertise in field ① Healthcare Practitioners and Technical - 29 ⊖ no realistic career/job goals upon release
	INSTITUTION WORK HISTORY ⊕ has a consistent institution work history Eval: 04-30-2016 Good Eval: 03-31-2016 Good Eval: 02-29-2016 Good Eval: 01-31-2016 Good Eval: 12-31-2015 Good Eval: 11-30-2015 Good
	POST INCARCERATION EMPLOYMENT ⊖ post-incarceration employment not secured ① unable to locate employment

Name: NAVARRO, SYDNEY MELISSA

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VOCATIONAL/CAREER *** Disregard Response Summary and utilize only the Progress & Goals section ***

<input type="radio"/> no release documents obtained to date
Progress and Goals
<p>Previous TEAM 11-09-2015</p> <p>Follow-Up: None</p> <p>No programming recommendations required at this time.</p> <p>Current TEAM</p>

INTERPERSONAL *** Disregard Response Summary and utilize only the Progress & Goals section ***

Status	Response Summary
	<p>RELATIONSHIPS</p> <ul style="list-style-type: none"> <input type="radio"/> victim of sexual abuse <input type="radio"/> immediate family member engaged in criminal activity <input type="radio"/> immediate family member engaged in substance abuse <hr/> <ul style="list-style-type: none"> <input type="radio"/> negative peer influences prior to incarceration <input type="radio"/> criminal associates
	<p>FAMILY TIES/SUPPORT SYSTEM</p> <ul style="list-style-type: none"> <input checked="" type="radio"/> consistent social support available <ul style="list-style-type: none"> Immediate Family: Financial Immediate Family: Emotional Immediate Family: General Relative: Financial Relative: Emotional Relative: General Friend: Financial Friend: Emotional Friend: General
	<p>PARENTAL RESPONSIBILITY</p> <ul style="list-style-type: none"> <input type="radio"/> children under the age of 21 <input type="radio"/> contact maintained with children <input type="radio"/> contact with other parent <hr/> <ul style="list-style-type: none"> <input checked="" type="radio"/> legally removed from financial responsibility for all children <hr/> <ul style="list-style-type: none"> <input type="radio"/> RRC (MINT) Placement is not recommended <input type="radio"/> explanation for not recommending RRC placement: Will review 18-24 months prior to release.
	<p>COMMUNICATION</p> <ul style="list-style-type: none"> <input checked="" type="radio"/> displays good communication skills

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INMATE SKILLS DEVELOPMENT PLAN**PROGRAM REVIEW: 05-04-2016****INTERPERSONAL**

*** Disregard Response Summary and utilize only the Progress & Goals section ***

Progress and Goals
<p>Previous TEAM 11-09-2015</p> <p>Follow-Up: Maintains appropriate communication with family and friends.</p> <p>No programming recommendations required at this time.</p> <p>Current TEAM</p>

WELLNESS

*** Disregard Response Summary and utilize only the Progress & Goals section ***

Status	Response Summary
	<p>HEALTH PROMO/DISEASE PREVENT</p> <ul style="list-style-type: none"> <input type="radio"/> overweight <input checked="" type="radio"/> height 5 ft. 4 in. <input checked="" type="radio"/> weight (lbs) 200 <input checked="" type="radio"/> BMI Score 34.3 <input checked="" type="radio"/> date calculated 05-13-2015 <hr/> <ul style="list-style-type: none"> <input type="radio"/> no regular exercise <hr/> <ul style="list-style-type: none"> <input checked="" type="radio"/> no evidence of behaviors associated with increased risk of infectious disease <hr/> <ul style="list-style-type: none"> <input checked="" type="radio"/> does not use tobacco (cigarettes, cigars, and/or smokeless tobacco) <hr/> <ul style="list-style-type: none"> <input checked="" type="radio"/> had a primary care provider or clinic (prior to incarceration) <input type="radio"/> does not have health insurance coverage upon release
	<p>DISEASE/ILLNESS MANAGEMENT</p> <ul style="list-style-type: none"> <input checked="" type="radio"/> complies with treatment recommendations and/or takes medications as prescribed, or none required <hr/> <ul style="list-style-type: none"> <input type="radio"/> medical Care Level II (Chronic care - stable) - See Exit Summary <input checked="" type="radio"/> no dental problems <input checked="" type="radio"/> no non-routine services/assistance devices needed
	<p>TRANSITIONAL PLAN</p> <ul style="list-style-type: none"> <input checked="" type="radio"/> does not require medication upon release from custody <input checked="" type="radio"/> does not require on-going treatment or follow-up after release from custody <input checked="" type="radio"/> TB Clearance Complete - See Exit Summary <input checked="" type="radio"/> health Services recommends for RRC placement
	<p>GOVERNMENT ASSISTANCE</p> <ul style="list-style-type: none"> <input checked="" type="radio"/> has not previously received Social Security assistance <input checked="" type="radio"/> inmate indicates he/she may not be eligible for Social Security assistance after release <hr/> <ul style="list-style-type: none"> <input checked="" type="radio"/> has not served in the U.S. Armed Forces, U.S. Military Reserves, AND/OR U.S. National Guard <input checked="" type="radio"/> spouse or a parent has not served in the U.S. Armed Forces, U.S. Military Reserves, AND/OR U.S. National Guard

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WELLNESS

*** Disregard Response Summary and utilize only the Progress & Goals section ***

Progress and Goals
<p>Previous TEAM 11-09-2015</p> <p>Follow-Up: Did not complete a wellness program...</p> <p>No programming recommendations required at this time.</p> <p>Current TEAM</p>



MENTAL HEALTH

*** Disregard Response Summary and utilize only the Progress & Goals section ***

Status	Response Summary
	<p>SUBSTANCE ABUSE MANAGEMENT</p> <p><input type="radio"/> evidence of inappropriate use of alcohol, prescription medications and/or illegal drugs in the year prior to arrest alcohol: Rarely amphetamines/speed: Daily</p> <p><input type="radio"/> no history of substance abuse treatment</p> <p><input checked="" type="radio"/> not currently participating in substance abuse treatment</p>
	<p>MENTAL ILLNESS MANAGEMENT</p> <p><input checked="" type="radio"/> no history of mental health diagnosis prior to incarceration</p> <p><input checked="" type="radio"/> no mental health diagnosis during incarceration</p> <p><input checked="" type="radio"/> no history of serious suicidal ideation or attempts</p>
	<p>TRANSITIONAL PLAN</p> <p><input checked="" type="radio"/> no medication required upon release from custody</p> <p><input checked="" type="radio"/> does not require on-going treatment after release from custody</p> <p><input checked="" type="radio"/> psychology services recommends RRC placement</p>
Progress and Goals	
<p>Previous TEAM 11-09-2015</p> <p>Follow-Up: None</p> <p>No programming recommendations required at this time.</p> <p>Current TEAM</p>	

COGNITIVE

*** Disregard Response Summary and utilize only the Progress & Goals section ***

Status	Response Summary
	<p>GENERAL BEHAVIOR</p> <p><input checked="" type="radio"/> no evidence of behavioral problems as a juvenile</p> <p><input checked="" type="radio"/> no evidence of behavioral problems as an adult</p>
	<p>CRIMINAL BEHAVIOR</p> <p><input checked="" type="radio"/> no onset of criminal behavior before the age of 14</p>

Department of Justice

Federal Bureau of Prisons



INMATE SKILLS DEVELOPMENT PLAN**PROGRAM REVIEW: 05-04-2016****COGNITIVE**

*** Disregard Response Summary and utilize only the Progress & Goals section ***

<input type="radio"/> criminal versatility: convictions in 3 or more categories <input checked="" type="radio"/> no significant history of violence: Less than 2 violent convictions
Progress and Goals
<p>Previous TEAM 11-09-2015</p> <p>Follow-Up: Currently participating in the Life Connections Program (LCP).</p> <p>Recommendation: Maintain positive interaction with staff and inmate peers. Continue LCP classes 5 X per week.</p> <p>Current TEAM</p> <p>maintained positive interactions with staff and inmate peers, participating in LCP, enrolled in GED, and enrolled in Parenting, working and paying FRP.</p> <p>Goals: continue working, continue GED and LCP classes, complete Parenting class and continue paying FRP.</p>


CHARACTER

*** Disregard Response Summary and utilize only the Progress & Goals section ***

Status	Response Summary
	<p>PERSONAL CHARACTER</p> <p><input type="radio"/> no history of behaviors indicative of positive personal character</p> <p><input checked="" type="radio"/> religious assignment: NO PREFER</p> <hr/> <p><input checked="" type="radio"/> no evidence easily influenced by other</p>
	<p>PERSONAL RESPONSIBILITY</p> <p><input checked="" type="radio"/> reports responsibility for current incarceration as:</p> <p><input checked="" type="radio"/> self (sole responsibility)</p> <hr/> <p><input type="radio"/> no efforts to make amends for their crime(s)</p>
Progress and Goals	
<p>Previous TEAM 11-09-2015</p> <p>Follow-Up: None</p> <p>No programming recommendations required at this time.</p> <p>Current TEAM</p>	

LEISURE

*** Disregard Response Summary and utilize only the Progress & Goals section ***

Status	Response Summary
	<p>USE OF LEISURE TIME</p> <p><input type="radio"/> no evidence of positive leisure time activities</p>

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RegNo: 46030-177







LEISURE

*** Disregard Response Summary and utilize only the Progress & Goals section ***

Progress and Goals
<p>Previous TEAM 11-09-2015</p> <p>Follow-Up: None</p> <p>No programming recommendations required at this time.</p> <p>Current TEAM</p>

DAILY LIVING

*** Disregard Response Summary and utilize only the Progress & Goals section ***



Status	Response Summary
	<p>FINANCIAL MANAGEMENT</p> <ul style="list-style-type: none"> + knowledge in maintaining checking account + knowledge in maintaining savings account + knowledge in utilizing an ATM debit card + knowledge in obtaining loans - no positive credit history - did not live within financial means - does not pay monthly bills on time
	<p>FOOD MANAGEMENT</p> <ul style="list-style-type: none"> + possesses grocery shopping/consumer skills + makes good nutritional choices to maintain health + possesses basic food preparation skills + knowledgeable in accessing community resources to obtain food
	<p>PERSONAL HYGIENE/SANITATION</p> <ul style="list-style-type: none"> + good personal hygiene and sanitation i quarters assignment: HOUSE B/RANGE 04/BED 127U
	<p>TRANSPORTATION</p> <ul style="list-style-type: none"> - does not have valid driver's license + No outstanding motor vehicle violations - does not own personal vehicle with appropriate insurance + possesses public transportation skills and has access to public transportation
	<p>IDENTIFICATION</p> <ul style="list-style-type: none"> - does not have photo identification - does not have birth certificate - does not have social security card
	<p>HOUSING</p> <ul style="list-style-type: none"> + established housing year prior to incarceration i established housing: paid rent i established housing: lived with family i established housing: non-publicly assisted + established housing not in a high crime neighborhood - no secured housing upon release i need to overcome barriers such as a criminal background

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INMATE SKILLS DEVELOPMENT PLAN**PROGRAM REVIEW: 05-04-2016****DAILY LIVING**

*** Disregard Response Summary and utilize only the Progress & Goals section ***

	RESIDENTIAL REENTRY CENTER (RRC) PLACEMENT ⊖ not recommended for RRC placement ⓘ Managment Decision: Will review 18-24 months prior to her release.
	FAMILY CARE ⊕ not responsible for obtaining child care for any dependent children upon release ⊕ not responsible for obtaining elder care for any dependent(s) upon release ⊕ not responsible for obtaining any other special services for dependents upon release
Progress and Goals	
<p>Previous TEAM 11-09-2015</p> <p>Follow-Up: None</p> <p>Recommendation(s): Maintain daily sanitation and hygiene. Keep room and uniform neat and clean. Began saving money monthly for release needs. Obtain driver's license, social security card, birth certificate, Pass Port, and/or other identification for release purposes. Continue participating in the Inmate Financial Responsibility Program as recommended, Make final \$25.00 Financial Responsibility Program (FRP) payment.</p> <p>Reviewed 407/408 current I.D. on File: None</p> <p>You will be reviewed for the Residential Reentry Program (RRC) within 17 to 19 months, and at that time we will discuss the Second Chance Act of 2007.</p> <p>Current TEAM</p> <p>407/408 current</p>	

Name Sydney Navarro
Reg. No. 46030-177
Federal Medical Center, Carswell
P.O. Box 27137
Ft. Worth, TX 76127

⇒ 46030-177 ⇒
Federal District Court
Ft. Worth Division
501 W 10TH ST
FORT WORTH, TX 76102
United States

